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16 INTERNATIONAL

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HUB LAW OFFICES

17 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
18 FOR THE COUNTY OF MARIN

19 CHURCH OF SCIENTOLOGY )  
20 INTERNATIONAL, a California not-for-profit )  
21 religious corporation, )

22 Plaintiff,

23 vs.

24 GERALD ARMSTRONG; DOES 1 through )  
25 25, inclusive, )

26 Defendants. )  
27 )  
28 )

CASE NO. BC 157680  
FURTHER EVIDENCE IN SUPPORT  
OF PLAINTIFF'S NOTICE OF  
MOTION AND MOTION FOR  
SUMMARY ADJUDICATION OF  
THE TWENTIETH CAUSE OF  
ACTION OF PLAINTIFF'S  
COMPLAINT  
DATE: September 29, 1995  
TIME: 9:00 a.m.  
DEPT: 1  
TRIAL DATE: Vacated

INDEX TO EXHIBITS

EXHIBIT 1: Declaration of Deborah Danos

EXHIBIT 1(A): Transcript of Radio Broadcast on Thursday, August 31, 1995, on KFNU Radio, Boulder, Colorado

EXHIBIT 2: Declaration of Jonathan Cole

EXHIBIT 2(A): Videotape of Demonstration, September 9, 1995.


EXHIBIT 3: Laurie J. Bartilson

EXHIBIT 3(A): Trascript of Audible Portions of Videotape of Demonstration, September 9, 1995.

Dated: September 25, 1995

Respectfully submitted,

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF MARIN  
12

13 CHURCH OF SCIENTOLOGY	)	CASE NO. 157 680
INTERNATIONAL, a California not-	)	
14 for-profit religious corporation,	)	[CONSOLIDATED]
	)	
15 Plaintiff,	)	DECLARATION OF DEBORAH
	)	DANOS IN SUPPORT OF CHURCH
16	)	OF SCIENTOLOGY
	)	INTERNATIONAL'S MOTION FOR
17	)	SUMMARY ADJUDICATION OF THE
	)	TWENTIETH CAUSE OF ACTION
18 vs.	)	OF THE SECOND AMENDED
	)	COMPLAINT
	)	
19	)	
20 GERALD ARMSTRONG, et al.,	)	DATE: SEPTEMBER 29, 1995
	)	TIME: 9:00 a.m.
21 Defendants.	)	DEPT: 1
	)	TRIAL DATE: None set

22 I, Deborah Danos, hereby declare:

- 23 1. My name is Deborah Danos. I am over the age of  
24 eighteen and a resident of Denver, Colorado. I have personal  
25 knowledge of the facts set forth in this declaration and could  
26 competently testify thereto if called as a witness.
- 27 2. I am the Director of Special Affairs for the Church of  
28 Scientology of Colorado, and act as a public spokesperson for

1 that Church.

2 3. On Thursday, August 31, 1995, a radio program  
3 concerning Scientology aired on Boulder radio station KGNU. I  
4 listened to or participated in the entire program. I listened to  
5 the program on my radio. My participation was partly taped, and  
6 partly telephonic.

7 4. One of the other participants in the program identified  
8 himself as Gerry Armstrong. He spoke at some length concerning  
9 his claimed knowledge of and experiences in Scientology.

10 2. I taped the broadcast, and that tape was then  
11 transcribed. Attached hereto as Exhibit A is a copy of the  
12 transcript, which I have reviewed and can verify as an accurate  
13 transcription of the broadcast.

14 I declare under the penalty of perjury under the laws of the  
15 State of California and the State of Colorado that the foregoing  
16 is true and correct

17 Executed this 22nd day of September, 1995, at Denver,  
18 Colorado.

19  
20  
21   
22 Deborah Danos



August 31, 1995

Thursday Evening Talk Program  
from KGNU  
Boulder Public Radio  
Boulder, Colorado

**Narrator:** Good evening, I'm Shawn Keenan Billson. Welcome to the Thursday evening talk program from KGNU. The recent raid by Federal Marshalls on the homes of two Internet users has focused national attention on several issues. The business practices of the Church of Scientology, privacy rights, search and seizure, copyright law in the face of emerging technologies, and others. Later in the hour, we'll be speaking with Scientology dissident, Gerry Armstrong. In the studio, a man who like most people knows far more about Internet than I do, Chris Yoder. My hope is that, in the course of the hour, we don't digress into simply Scientology bashing. There are many more important issues at stake. It's important to offer the Church of Scientology their say in this matter. While invited to participate in this program live, the Church's Denver/Boulder spokesperson declined the invitation. However, we did speak earlier this afternoon, before entering the issue at hand. I asked her about the history of the movement. A movement which despite many late night television spots, I find I actually know very little about, let alone that it is in large part based on secret information. Secret information which the Church is willing to go to Court to defend.

**Dano:** Scientology is a religion. The reason it's a religion is because it deals with the spirituality of mankind. It's slightly different in its emphasis in that Scientology is an applied religious philosophy. And by that I mean, Scientology has specific procedures and techniques and tools that can be learned, that you can apply to your life on a daily basis. So, it's an actual application of technology as opposed to most religious belief systems which are just that: believe systems.

**Narrator:** Applications of technology in what way? I'm curious about that. Now, I know it was founded in 1959 by L. Ron Hubbard who, of course, as a Science fiction writer had a great interest in technology. But what specific technologies?

**Dano:** Well, we start out with very basic things and then you work forward into more advanced abilities and, by the

way, the Church was founded in 1954.

Narrator: Oops, sorry, 5 years off, 6 years off.

Dano: What we try to do is enhance the ability of a being and that starts with right here, today, right now on your basic everyday living skills. So, one of the first things that a person would be able to learn, if they went down to a Dianetics Foundation or a Church of Scientology, would be how to communicate. What's an effective way to communicate. And you learn very simple things, like to look at another individual while you're communicating to them. Too acknowledge, by way of a nod or an "ok," or "I see," something like that, in the process of communication and so there are particular points that you actually learn how to use in the process of communication so that your communication is much more effective. That way you know that the person that you're talking too is actually getting what you're saying and you're actually getting what they're saying because a lot of the ills that we have in society today are actually off-shoots of a person's inability to effectively communicate.

Narrator: So in a sense, it's a large interpersonal communication program.

Dano: Yes, sure, it starts that way. One's own -- the shortcomings that we have individually often times stem off of how other people view us or our ability to interact with other people and our environment. And when you have a difficulty in that area, you begin to put stops on yourself. You begin to limit your own realm of influence because you haven't been effective and you aren't winning. It's not fun. So you withdraw. These skills, learning these kinds of skills, communication being one, help you to learn how to be more effective in your dealings with others and your environment and so therefore you begin to win. Your realm of influence then expands, you become more able, you become more stable in your own identity and your own convictions and much more effective.

Narrator: Is it fair to say then, that this is more of a psychological program than an actual religious program?

Dano: No, I don't think so because we're not operating out of the mind. I mean, these are tools. They're applied in a physical sense, manifest in the physical universe but we have found, through L. Ron Hubbard's research in the area, that these are actually ways that you use your spirituality. So one's ability to communicate or not



communicate has an effect on your spiritual well being. So it very much is rooted in the spiritual and not in the psychological.

Narrator: You mentioned earlier, people going to either a Church of Scientology or a Dianetics Foundation Center. What is the difference between the two?

Dano: Well Dianetics was the very first research that Mr. Hubbard did in the early -- well he actually researched for probably 30 years before the book came out in 1950. That is a process which one can read from the Dianetics book obviously which is available everywhere, that deals with the troubles that one has in life and living that stem from past bad experiences. So, in essence, if one was bit by a dog at the age of 3, and then had some kind of a fear of dogs that had developed over the years, that would be a prime thing that Dianetics would handle. You could go in to a Dianetics Counseling session, run that point in time where you were actually bitten by the dog and clean up the emotional trauma and stress that was created at that point. Therefore, from that point forward then, be able to be in the presence of a dog or an animal and not have that upset impinging on you keeping you from doing things in life that you want to do. That's a very specific area. Scientology grew out of the Dianetics process, in that, in applying Dianetics, the people who were reading, in the early 50s, the Dianetics book and co-auditing (it's how we call it) one another. They found that at points they would discover incidents that sort of transcended the day to day living. They would be unexplained, other incidents from other times, which brought us into the realm of -- well, you could say past lives. Therefore, it was the first evidence that Mr. Hubbard found that there was an actual being that was more than just your this lifetime body. That you are actually are a spiritual being which we refer to as a thetan. That this spiritual being exists an eternity.

Narrator: Later in this program, we're going to hear charges that the Church uses techniques which are coercive and methods which are secretive and would discredit it if it were brought to light in the public view. It would make it more difficult to find new converts. How do you answer those charges?

Dano: Well, that's bunk. There are some very specific things that I can cite. First of all, I just want to point out that --

Narrator: Where do these unhappy people come from, in your mind?

Dano: Well, you know, I can't really say where the unhappy people come from. I want you to know there are a handful of very verbal dissenters and they do manage to make their way onto communication lines around the country. They're very available. They find how to hook up with people like yourself. They get their message out. The guys who are doing well are not particularly motivated to call up a station and say: I just wanted you to know, how happy I am with my life. They're busy doing their lives and doing their thing and they're not busy creating havoc for others. So there's that first and then second of all, the religion of Scientology and in the information that's contained within the area of Dianetics, is a very available information, there are no secrets within that body of data other than maybe 5% of the upper level scriptures which are intended for those people who want to pursue that higher level of awareness and spirituality within the religion of Scientology and we have very strong feelings about those things being kept confidential.

Narrator: Can I ask why?

Dano: Sure. Mr. Hubbard did a great deal of research on the path to spiritual freedom. So there's a particular route, if you will, where a fellow starts out and has a certain awareness level and as you gather information and knowledge and experience, you travel along this path to spiritual freedom. Those scriptures are intended for people who have travel that particular path and are ready to receive that information. It's a very important thing that they get these pieces of information in the right sequence.

Narrator: Did he write them?

Dano: Did Mr. Hubbard write them?

Narrator: Yes.

Dano: Absolutely. They're products of research. They're absolutely products of research in the area of spiritual freedom.

Narrator: And thus copyrighted.

Dano: Absolutely copyrighted.

Narrator: That's your primary complaint, in this case. Now this isn't the first that the Church of Scientology has alleged copyright infringement. Is this -- well, I guess I want to ask, why is it such a problem for the

Church.

Dano: Well, this particular case is a problem because these two men who run a bulletin board called FACTNET, have been accumulating documents from the Church legally, and illegally for a number of years. I venture to say 10 to 15 years. They have a lot of information which is readily available to the public. However, they have also information which is not available to the public. Information which could only be tracked back to a theft which occurred in one of the six sites where the upper level scriptures are stored. Therefore, they have --

Narrator: So you're alleging, not only copyright fraud, but theft.

Dano: Well, I don't say that either of these men actually did the stealing. I only say that they definitely were stealed -- stealed, sorry -- stolen and that they have access to stolen property and are using stolen property. And not only using it but distributing it worldwide on the Internet against the copyright laws.

Narrator: But, of course, that's kind of a nebulous copyright law area at this point.

Dano: Well, you know, that's really aside from the point. The point is, if a man originates some information and holds it very precious and has a very strong feeling about the fact of this material being useful only within its particular context. There is a copyright law and a trade secret law to hold confidential those materials which are owned by the originator. That's what the law is there for. It's there to protect the rights of the originator and it doesn't matter whether it's cyberspace or whether it's on American ground or French ground or where ever it is. The copyright law is there to protect the confidentiality and the ownership rights of those materials. That's the law that's been broken in this case.

Narrator: That's Deborah Danos, she's the local spokesperson for the Church of Scientology. We spoke earlier this afternoon. She was unavailable to be here live with us tonight. I do welcome Chris Yoder, also unavailable tonight - I should mention the two defendants in this case: Lawrence Wollersheim in Boulder, and Bob Penny in Niwot. Chris what is your take on what we've heard on the first part of this.

Chris: Well, my interest isn't necessarily in the religious aspect of what's going on. My interest is in more a

protection of first amendment rights and freedom of speech rights on the Internet. The Church of Scientology isn't necessarily the first to attempt this sort of restriction of those rights and I would mostly take issue with the fact that the Church is trying to intimidate people into not distributing this information. The information is out there. There's nothing they can do to recover that information. It's available in probably hundreds of different places in the worlds right now.

Narrator: It occurs to me that most Church spend a great deal of time trying to disseminate their philosophies not trying to restrict their distribution.

Chris: From the small amount of research I've done, it would appear to me that the Scientologists in a way are afraid of this information getting out because then it'll be out in the open. Just some of the not crazy ideas but odd ideas that the Church holds.

Narrator: But if they truly belief that, why wouldn't it be ok to have that widely disseminated.

Chris: Got me. I don't know.

Narrator: Is it a money issue?

Chris: I would think so. I've seen some documents that attest to the fact that to gain access to all this information through the Church, through Scientology processes would be on the order of \$300,000 or \$400,000 just to get this information through the auditing and the processes and the training that you get through the Church.

Narrator: The raid on Lawrence Wollersheim, and Bob Penny's homes is not the first. Yesterday, a decision came down in Washington D.C. which was sent to me today. Where a Washington D.C. Netuser, distributed and obtained information and passed some of it onto the Washington Post. Church of Scientology subsequently sued both Robert Leiby and the Washington Post, itself. They won the case and to summarize it, one paragraph from this decision: The plaintiff argues that the dissemination of the Advanced Technology documents and those of the essentially secret ones, that are in question here, would case an irreparable injury, namely future copyright infringement and trade secret misappropriation. This is the sole justification the plaintiff offers to support its argument, for prior restraint to the press, if a threat to nation security was insufficient to warn prior restraint in New York

Times Co. v. United States, of course the Pentagon papers, the threat to the plaintiffs' copyrights and trade secrets is woefully inadequate. The court obviously not impressed in this case at all by this kind of allegation.

Chris: I think part of the problem: One of the reasons that the raids were even allowed to take place initially is that the Courts didn't really understand the issue and I've also heard allegations that the people who actually filed the suits on behalf of the Church of Scientology used what are essentially front corporations so that the Courts did not realize that they were dealing with a Scientology issue.

Narrator: You're listening to the Thursday Evening talk program, we're KGNU in Boulder and it is 19 minutes past 6 o'clock. The topic should be obvious by now. Chris Yoder is with me and on the line from California, we have another guest and he is a long-term dissident of the Church of Scientology. He was a member from 1969 to 1981, and at this point, if you would like to join us with your calls and questions, our number is 449-4885 in the metropolitan area. If your listen in Ft. Collins or in a mountain community, 1-800-737-3030 is the number to call. Gerry Armstrong, welcome to Boulder County Public radio. Hello, Gerry?

Gerry: Yes, I'm here, can you hear me?

Narrator: Yes we got you in now.

Gerry: Ok.

Narrator: Tell me a little bit, first, about your involvement with the Church of Scientology. What interested you in that area. What drew you to it.

Gerry: Initially it was the story of L. Ron Hubbard and it was the promises that Scientology makes to anyone that asks.

Narrator: What are those promises?

Gerry: They really concern the resolution of the human condition. The ability to be at cause over matter, energy, space, and time. Freedom from virtually all the human ills.

Narrator: So you began this process in 1969, you dropped out in 1981, why?

Gerry: The short one is, it was time to go. But what led up to that was a search, really, through the archive of L. Ron Hubbard. I had through 1980 and 1981 the job of assembling an archive, personal archive of L. Ron Hubbard, which was going to form the basis for a biography and Scientology through Hubbard's attorney contracted with an outside writer, and I worked with that writer through 1980 & 81. Through the assimilation of the documentation, which I put together, much of it was -- are in Hubbard's own writing and was an archive for the repository of documents which he at one time thought was lost. So, I really deprogrammed myself and I came to realize that Hubbard had lied about his past and about his credentials and about the efficacy of his technology and about his intentions and about the practices, policies of Scientology.

Narrator: Before we go further, Mr. Armstrong, we had a call and I want to verify its accuracy, when we were promoting this program about a half-hour before it went on, saying that your settlement agreement of 1986 involved your agreeing to make no media appearances. Is that true?

Gerry: Essentially, yes.

Narrator: So you're violating the law by appearing here?

Gerry: No. What I'm doing is in Scientology's mind violating the terms of its settlement agreement with me.

Narrator: All right. We already have a number of callers and I'm going to keep you on the line and we're going to take a couple of them.

Gerry: Sure.

Narrator: Ok, first of all, Brian, you've been waiting a long time in Boulder. Your on, Hi.

Brian: Thank you very much. Thank you for airing this show tonight. I wanted to respond to the comments the woman representing Scientology --

Narrator: Deborah Danos, yes.

Brian: Deborah Danos, on two levels. First the issue of great religion/technology and the other regarding their efforts to block the free flow of information on the Internet. As far as it being a valid religion or science, I don't like to judge anyone else's spiritual

or lifestyle as such but when you look at Scientology and reports from former members, books that have been written and you see that they're using, basically using some really crude biofeedback technology mixed with some really crude psychological techniques to access painful memories and supposedly exorcise those out of you, you realize you can go to Radio Shack and pick up a biofeedback device and read a book and do it yourself and not have to pay hundreds and hundreds of dollars to do it. If you also read some of the material presented, you'll find that as he describes, talking about communications, in theory and practices. That some of the former members going through training to become auditors were taught to do this by sitting in a chair for two hours without moving any muscle, staring into the eyes of another person and if you moved or blinked, you had to start all over again. Moving on to then doing that while the person is verbally harassing you, you might claim that that's a technique for improving your communication. I would classify that as a technique to keep control of others.

**Chris:** Yes, I would classify that completely as brainwashing. The problem that the Scientologists are going to have is that the books that describe this from ex-members, the authors have given permission for this information to be distributed electronically and it's everywhere. It's almost unavoidable. This is, I think, one of the biggest issues that the Internet has faced on a world-wide bases -- there has been some big things just in the United States -- but on a world wide basis, this is the biggest most unifying cause I have ever seen on the Internet.

**Narrator:** Brian, were you directly involved? I gather you were, how long?

**Brian:** No, I was not involved with the Church of Scientology. I am involved with the Internet, though. That leads onto the second issue I wanted to bring up and hopefully Chris can address some of those.

**Narrator:** Ok.

**Brian:** Is that you judge somebody by their actions usually, and by observing the acts of the Church of Scientology on the Internet, it's a very raw anarchistic medium of communication. It's something new to the human race that I think a lot of people want to protect that sense of anarchy and self-control over the Internet and actions of members of the Church of Scientology which amount to essentially canceling the messages of other

people because they contain material the Church doesn't like, is their direct impediment to the free flow of information and freedom that hopefully will build through the Internet. So right there, I think their actions prove the opposite of what they intend. I'll let go know, that was the essence of my comments.

Narrator: Ok, thanks Brian.

Brian: Thank you.

Narrator: Gerry?

Gerry

Armstrong: Yes.

Narrator: Before we go onto Chris' response about the Internet, I want to ask you one question while it's still in my mind. How much money did you spend on the Church of Scientology and its training in the 15 year period that you were involved with it.

Gerry: You know, I spent a relatively little amount because at the beginning of 1971, I joined an arm of Scientology called the Sea Organization.

Chris: So you signed a billion year contract, did you?

Gerry: Correct.

Narrator: That's what it is?

Chris: A billion year contract. Contract to the Sea Org for one billion years and this is standard practice in Scientology.

Gerry: Right.

Narrator: Oh, ok. Now you were going to respond to Brian's question about the Internet and its anarchistic nature. Is it going to last?

Chris: I think it will because it is such a nebulous creation. It may not last in its current incarnation, but with the advances that's being seen in communications technology, there may be alternate Internets, in a sense, where complete anarchy reigns. Another thing that the Church tried to do is not only have they canceled specific articles; at one point there was an attempt by a lawyer --

Narrator: How is that done?



Chris: What happens --

Narrator: I would think that once it's out there, the sender would be the only one that could cancel. Aren't they encoded in some way?

Chris: They're -- the authentication currently is fairly primitive. What they're called -- they're called newsgroups and the newsgroup in question is called alt.religion.scientology which gives some information about the subject matter and somebody would post a message to this newsgroup and then -- normally only the site administrator for the site that it was posted from or the original user can cancel a message and that sends a special message which news servers understand and act on which essentially erases that article which is sent through the Internet as an individual file. What happens is there have been several people canceling those articles with forged cancels. The people in, not just alt.religion.scientology but a more main stream hierarchy called news.admin.netabuse.misc they took to calling the people who were canceling these articles, the cancel bunny. Because they just kept on going and going and going. You know, kind of like the energizer bunny. But there was also an effort by the Church to remove alt.religion.scientology completely to completely eradicate the entire newsgroup which is hundreds of files around the world.

Narrator: All right, Tom in Denver, you have waited forever, thank you. You're on KGNU.

Tom: Thanks. I just want to say listening to the woman explaining the business of spiritual well being, how she described it, I kind of couldn't tell the difference between that and mental well being and it seems to me that with all this kind of hocus pocus and the secrets it has a lot to do with money and probably because it's a Church then it's involved in -- tax exemption is involved. I want to relate some amusing anecdote because my first contact with Scientology was in New York in the late 60s.

Narrator: Did you become an actual member?

Tom: No, I didn't but what I did was I followed an attractive woman -- where they used attractive women on the streets to pull guys in, just as the moonies did -- and so I was trying to frankly catch the woman obviously and she said, well if you want to get to know me, come to one of our meetings. So I said, what the hell and I went. There was a film of Ron Hubbard and

there was an interview but I think it was in English -- interviewer and apparently, the questions were not prearranged because the guy hit him with one thing and he said well what if somebody disagrees with you or something like that and just in a very off-handed manner, he said well those chumps -- and then he went on. But he used chumps and I looked around me and they were all hypnotized by this whole thing. Ok, that's New York. I went to Stockholm, the same thing. Beautiful women on the street, I also followed another beautiful woman up into the office and I saw in the office, they had a big picture of L. Ron Hubbard on the wall and a little box underneath. There was a little message on there that said, send your messages to Him, with a capital H, so that's enough of my anecdotes but I'd like you to comment on any of those things and also answer the question, are they tax exempt and I'll hang up.

Narrator: Chris is that true?

Chris: Yes, they are tax exempt and --

Narrator: Is the publication company, though, also tax exempt?

Chris: RTP?

Narrator: Yes.

Chris: I do not know for sure.

Narrator: -- believe I've ever heard of another religion using the term trade secret.

Chris: Not that I know of. I mean, it's certainly ok for the Pope to copyright something he's written recently but you don't see the Gideons out trying to enforce the copyright on the Bible.

Narrator: Well, thank you very much for you call, Paul. We've gotten Tom. There we go. Hugh, in Boulder. Hi, you're on KGNU.

Hugh: Hi. I don't know if you still have the person on line.

Narrator: Yes we do. Gerry, you are still with us, right?

Gerry: Yes.

Narrator: Good.

Hugh: Oh, an ex-member who has had a lawsuit and a

settlement. All right. You said, I believe that you found out in your research, among other things, that L. Ron Hubbard had lied about his intentions, I believe that's an exact quote. That's certainly an odd thing to say. First of all, how does one know that someone has lied about his intentions. It's not an easy thing to decide without going through, let's say, a court of law and even then it would be difficult to prove such a thing. Second of all, seems to me that if he did do that, you must be guilty of exactly the same thing because you admitted that you are violating the terms of the settlement. You said, you admit you are violating the terms of your settlement with the Church of Scientology. If so, it's obvious that you lied about your intentions when you made that settlement. What's the difference between you and L. Ron Hubbard?

Narrator: Mr. Armstrong?

Gerry: Yes. Well, the truth is, and this is something that Hubbard and I would disagree about, but there is no difference between me and L. Ron Hubbard. The problem was that L. Ron Hubbard said that we were different. L. Ron Hubbard said that he had the way.

Chris: L. Ron Hubbard tries to make himself out as a saint but there have been numerous depositions that L. Ron Hubbard said, "Mate writing Science Fiction for a penny a word is ridiculous, the best way to make a million dollars is to start a religion."

Hugh: Right, I've heard that quote. I'm very familiar with that quote. I in the late 60s had a brief flirtation with Scientology in New York, like one of you other callers and it took me about a week or two of two or three a week processing to see through the whole thing. I was caught up by the drama of it and I was sort of skeptical from the beginning but I wanted to see what was going on. Now I didn't have to pay them anything because it was a strange situation but anyway what happened was, after about 2 weeks of that, I did see through it very, very clearly and I couldn't stretch my credulity any further, so I just dropped the whole thing. But I am a little disturbed about the witch hunt aspect of this. It's true, it's possible to point out all kinds of deceptions and confusions and weirdnesses about this so-called religion but on the other hand, if we do believe in freedom of religion, freedom of speech, freedom of expression, we have to be pretty liberal, we have to stretch ourselves to allow a lot of things. I think I tend to be more liberal in the true sense of liberal than most of you people who

want to be involved in a witch hunt against the Church of Scientology. I think that's false --

Narrator: Well I don't think that's what we're doing here tonight --

Gerry: Exactly --

Narrator: We're not --

Hugh: I think you are - you admitted that you lied about your intentions Gerry and that you haven't apologized for it. You admitted that you lied when you said that you made a settlement with the Church of Scientology. I don't think that's integrity -- do you have any integrity - personally?

Gerry: Okay - let me respond to those various things. And the first is that -

Narrator: I'll have to ask you to speak up a bit Gerry you're fading on you here --

Gerry: Okay -- well let me respond -- the first thing is that we are against witch hunts and that's exactly why I oppose the raids by Scientology against people who have taken a stand against Scientology and to speak freely and openly about Scientology and communicate openly about Scientology on the Internet. The witch hunt is in going in the opposite direction it is Scientology which is on the hunt and which is harassing individuals and which is threatening individuals and those are sufficient reasons for me to not honor a contract which would prevent me from so speaking out and so defending those people who ought to be defended. I have the knowledge with which to defend them and that's why I speak out, but prior to my ever speaking out you have to understand this about Scientology. I settled with them in December of 1986 with the great hope that their attacks against me, attacks on others would cease. And that was what they promised to do, but they could not live by that promise and . . . [portion of the tape fads out here] . . . and they continued their rather mad policy called fair game. And fair game is an obnoxious policy -- an obnoxious doctrine and very dangerous. It's something that came out of the relatively mad mind of L. Ron Hubbard and that's why it was only after Scientology could not desist after three years of their attacks on me and threats against me and attacks and threats against other innocent people of good well.

Narrator: Okay.

Gerry: I was brought back into the legal battle by Scientology's actions --

Narrator: Okay.

Gerry: That's why I do not honor, can not honor that --

Narrator: That settlement? What you're saying essentially is that the Scientologists violated that settlement first -- this is just in response?

Gerry: It isn't only in response -- you also have to understand that the settlement agreement by and of itself standing alone is unenforceable -- is against public interest -- is illegal.

Narrator: I think another way to look at it is that you're -- in this media appearance you're upholding a higher contract which is the First Amendment of the United States Constitution. Hugh, I just a quick, something to say to you. You're last name won't happen to be Keygin would it?

Hugh: No it's not -- no -- but I think I understand what he's saying, if they broke the agreement from his viewpoint then I would say he might be justified in breaking it. But -- my viewpoint is not that I'm an upholder of Scientology, I'm not an upholder of the Pope and Roman Catholicism either, but on the other hand, all religions ought to have legal rights, all -- I think if Scientologists have broken the law, this can be settled in the courts --

Narrator: Exactly.

Hugh: It ought to be settled in the courts, it ought not be settled on talk shows. That's my statement.

Narrator: We are discussing what the court is doing. We don't, I don't personally have a problem with the Scientologist's belief. I do have a problem with the fact that they are raiding three people in the last three months --

Hugh: The government did that, the U.S. Government did those raids not Scientology.

Narrator: At the behest of the Church of Scientology. They didn't decide to do it on their own.

Hugh: The U.S. Government didn't take the cause of the Church of Scientology's complaints against certain individuals and if you want to accuse anybody of those raids, you have to accuse the government because they're the ones that did it.

Narrator: All right, Hugh, we've got to move on 'cause we got a lot of calls.

Hugh: Oh, you're not listening to me.

Narrator: I am listening to you, but we've got a lot of other calls and I think you've made your point, thanks.

Narrator: All right, Pete, you've been on the line for a while. Welcome to KGNU.

Pete: Hi, thanks. So, I just wanted to talk about a couple of things here real quick. As Ms. Dano said in the beginning, it is amazing how a couple dissidents can create such a roar about Scientology. I don't want to carry on any Scientology bashing or anything like that but I do want to talk a little about my own experience and perhaps give some information that has been missed so far in the program.

Narrator: All right, try to keep it short because we're getting a lot of calls.

Pete: Understood, yes. Now, I've been involved in Scientology since about 1988 and what I would like to say just real fast is, my viewpoint on Scientology or any other type of practice is just in the workable of it and the proof is in the results and Scientology gets results. When I first got involved, I had a drug problem which was very, very readily, quickly, and efficiently handled and I've been leading a very health, happy, industrious life since then. Now, I just wanted to correct one thing, which was brought up earlier. That was a statement that I believe, Mr. Yoder made about the money issue of the copyright infringements of these materials and is this a money issue. There was a statement made of people having to spend \$300,000 to \$400,000 dollars to get this material. I just wanted to correct that and let it be known that, that figure is astronomically incorrect and Mr. Yoder probably just didn't know that and I'm not accusing him of trying to make that into anything else. It's just the actuality is, is that's not actually correct. One other thing, really quick and in passing is there is a lot of emphasis here a little while ago placed on signing a, for example a billion year

contract in servitude of the Church or what not. This is nothing significant. This is just nothing more than a commitment of service to a religion in which you believe in and obviously nobody is going to sign that unless they're dedicated and they personally believe that, that is the thing for them to do. It's no different than a priest taking vows of eternal servitude to God, it's no different. It's a different religion, it's a different system, but that's all.

Narrator: All right. Well, thank you very much for your opinion, Pete.

Pete: Absolutely, yes. Thank you.

Narrator: Bye bye.

Pete: Bye.

Narrator: 449-4885 is the number to call if you would like to join our conversation with Chris Yoder and Gerry Armstrong on the line with us from California tonight as well. Let's see, Charlie is on line 2 and thank you very much for joining us, Charlie.

Charlie: Hi, there.

Narrator: Now, I know that you have an interest in this because we spoke briefly earlier. What would be your question for Mr. Armstrong or Mr. Yoder.

Charlie: Well, I was just going to chime in. I happened to read that decision in the court in Alexandria, Virginia, the -- quoted a couple of paragraphs from.

Narrator: Right.

Charlie: I find it's interesting because -- I left the Catholic Church and became a Unitarian and the Pope didn't show up on my door with what the IRA calls Jack with thugs and break the floor down to take back my Baltimore catechism.

Narrator: I'm very happy to know that.

Charlie: Yes, that's a very significant difference between the two different organizations. The Pope doesn't get upset if I stand on the street corner and explain why I thought the Catholics were wrong and that's a major difference between the two and that's one of the reasons I've [inaudible] Church of Scientology was taking the position that if you disagree with the

Church of Scientology, we'll show up on your door step, break the door down, [inaudible] take whatever you want, regardless of whether it's got anything to do with copyrights or not and that's why I was so happy that the decision yesterday -- is one per step on long road but never was a first step.

Narrator: Well, it creates a legal precedent for the case, locally.

Charlie: I think, well, it's in -- technically no, because it's in a different circuit but it certainly set some pretty strong case law and there were two different things in there that the Judge in Alexandria found that I were particularly interesting. One is the stuff is out in the public domain in so many different places, not just alt.religion.scientology but FTP sites all over the place, the first one I saw it at was in Beijing, China which -- China is not a place that I ever thought of as a bulkwork of free speech, but it was there. That was one point and the other point was, the Judge made the very clear statement that because Scientologists claim to be a church and he granted for purposes of argument the fact that they were a Church. Therefore, it doesn't seem likely that adherence of that Church would want to go to another Church or go to another organization and cheat and spend less money to get the same materials, especially when the Scientologist maintain the material by itself as inadequate. You got to have this training, you have to have auditing sessions in order to understand about all these greligouls, and trained gouls, and xxx and the marquet. You aren't going to, if you're a devout Scientologist who believes in stuff and believes in the accuracy of the religion, you aren't going to pack your bags and go to the Unitarians to learn the same stuff or any other organization to learn the same stuff, therefore, there's no economic loss from the fact that Gerry Armstrong or Dennis Erlich or Arnie Lerma or anybody else or you and me are discussing talking to plants and animals and how you do it. You know, it's just not a rational thing to be afraid of open discussion.

Narrator: All right, well thank you very much for your comments.

Charlie: Oki, dok.

Gerry: May I say something about the materials?

Narrator: Yes, please do Gerry.

Gerry: Okay. There are actually two levels, two important



levels to understanding this. The first one which, I'll mention briefly and then get back to -- Yes?

Narrator: Yes, you're here.

Gerry: Ok -- is intelligence and that is that the raids were conducted for intelligence reasons and the proof of that -- although it's already know, but certainly a big piece of it is that on Scientology's search list is the name Armstrong and Greene. Now Armstrong is me. I'm not part of Scientology's scripture. I'm not included in L. Ron Hubbard's OT materials and then another name that is in there is Greene and Greene is my lawyer. And he's also a lawyer for Wollersheim.

Narrator: Ok.

Gerry: And a lot of the material which was taken by Scientology because they took all sorts of things. They raided a guy, Wollersheim, that they were in active litigation with.

Narrator: Actually, my understanding --

Gerry: They were to get in there and take his files and have access to all of communications with all of his lawyers or anyone else in the world, while he had active litigation going with Scientology.

Chris: Not only was there active litigation but there was a case that was already closed where the Church of Scientology owes Wollersheim, \$2.5 million and nobody's paid it.

Gerry: That's active. That's in the court of appeal right, this very moment, oral argument is next week in September.

Narrator: Ok, thank you very much. This is the Thursday evening talk program on KGNU, we're 88.5 FM, in Fort Collins 99.9. It's 13 minutes before Seven O'Clock, folk music coming your way on Highway 322 at that time. Right now, Steve in Boulder. Thanks for joining us, Steve.

Steve: Hi, Scott.

Narrator: You're on KGNU.

Steve: Oh, thanks for taking the call. One thing I wanted to get across here is that -- what we have here is clear that there are materials where the Church of Scientology that are held in in copyright and every

newspaper you pick up, you say, this will not be reproduced without the permission of the -- this, that or the other paper -- and that's all that the Church is asking for is not to have what they worked to get, whether you believe it or not, is immaterial.

Narrator: Ok. A key part of this decision with the Washington Post yesterday.

Steve: Who's speaking?

Narrator: This is Shawn.

Steve: Oh, hi Shawn.

Narrator: Ok. Yes, the Washington Post decision, yesterday -- There is in journalism and how this plays on the dissemination of information on the Net, I don't know, but there is something called fair use. And what that means is, you can use passages of a reasonable length, provided they are cited to their authors. Now, periodically people do get sued on these grounds but if it is a journalistic organization and in this case, the Washington Post, then it's ok, provided the source is cited and it isn't a wholesale repeat of the original text.

Steve: That's totally understandable but a lot of these are protected with trade marks and with trade secrets are actually classified as trade secrets. Now I work as an engineer in a company and if one of my competitors came in and took my engineering document, then broadcasted 'em off to people who were marketing actively against my company, well that would be a serious issue, too. And this is basically what the Church is looking for. They've got these materials which is just small fraction of -- accordingly to Deb Danos, it's 5%. You can walk into any Church and pick up 95%. You know you can get information on how to get people permanently off drugs; the Narconon program run by the members of the Church of Scientology has a 69% to 78% success rate based on independent studies and things like that. You know, that kind of material is available and everybody thinks, it's [inaudible] secret -- it's a little inflammatory --

Narrator: Could you give us a reference for that 69% to 71% success rate?

Steve: I think I'm going to refer you, well if you can get a hold of Narconon -- they can -- I don't have that, I'm sorry, I didn't know that this was going to be on

tonight, so I don't have that reference right in front of me. But if you call Narconon, I'm sure they can tell you who did the study.

Narrator: Well, 'cause I've also read reviews of the Narconon program that said some of the things they do in there could be fatal to the -- to certain heroin addicts.

Steve: Can you a reference on that?

Narrator: Not right off the top of my head, sorry. Ok, well, we have a disagreement on that one and I've got to move on, but thanks for your call, Steve.

Gerry: May I respond.

Narrator: Try to make it quick, 'cause we're running out of time.

Gerry: I'm trying to get this down. Scientology promotes to the broad public that it is among other things, that it is compatible with Christianity. You will find in its glossy book, What Is Scientology?, that it claims to be compatible with Christianity and honors the Christ as the son of God. Now, when you get into this so-called trade secrets, that's where discover that Scientology -- L. Ron Hubbard wrote, and everyone must believe, and these are clearly beliefs -- this could not be scientifically demonstrated as the young lady earlier claimed that it was Hubbard's research. Hubbard claims that the concept, the ideas of Christ, God, heaven, the whole Bible story are implants that is the electronic commands --

Steve: Well, let me respond to that. In this case, miracles. In 1952 we had a tape called "Miracles" where he called Jesus of Nazarus the hope of mankind.

Gerry: -- electronic pictures and commands implanted in people by implanters, 8 - 76 billion years ago. Scientology is in direct conflict with Christianity. Scientology promotes into the Christian community and claims in its publications that over 50% of its personnel, of its adherents come from Christianity. What Scientology -- the processes that are involved in these trade secrets bring one to the point of excepting Hubbard's theology.

Steve: If you believe that, then that goes with it. If you don't believe it, then it's not a problem.

Gerry: And there is a certain madness that combines with it because the person who adheres to that --

Narrator: Ok. You guys are going to talk on top of each other and we won't get anywhere but I think we've got the point of the disagreement here.

Steve: Thanks for taking by call, Shawn.

Narrator: That's ok, I'm glad to have you join us.

Gerry: I think that this is a very serious theology and social issue.

Steve: You can believe what you choose to believe. If you don't believe the materials, that's fine.

Gerry: That's why they are so afraid because when it becomes publicly known that Scientology in its core is anti-Christian --

Narrator: Gentleman, gentleman, we've got this point, ok. Thanks for your call and John, you've been waiting a while, thanks, you're on KGNU.

John: I've got an anecdote and couple of questions.

Narrator: Ok, try to make them quick because we've got like seconds left.

John: I will, I was approached by a Scientologist who fairly high up in the organization who claimed he could and I guess they all claim this, that they can astro-project and I said I'm willing to sign up if you can just give me a little demonstration and of course he couldn't, 'cause they can't and that's the very interesting thing about them. It's just utter malarchy and obvious malarchy at that, although very dangerous.

Narrator: But obviously if someone told you that, there are people that believe that.

John: Yes, people will believe anything but it's interesting, it's very easily disproven. The other -- the questions I have regarding this raid. How on earth could a judge allow a private organization to raid people's houses on a copyright infringement. I've never heard such a thing. Is the judge a Scientologist?

Narrator: No, but from what I understand and this almost as anecdotal as what you said about the astro-projection; they took advantage of a law that was designed to protect software distributors by a pre-raid to gather pirated software, or pirated tapes, or pirated records to seize for evidence. One of the problems with the

Wollersheim/Penny raid is that the defendants never got inventories of what was taken and it went straight to the Church and they're allowed to sift through this without any representation from the defendants.

John: Do they have any legal recourse, assuming that they're found not to be in violation -- do they have any legal recourse against the Church for coming into their house and taking their stuff, even if a judge said it was ok.

Narrator: I don't know that at this point, but there was a recent ruling handed down in Denver saying that the Religious Technology Corporation, which is the Scientologist front that filed this lawsuit, now has to give Penny and Wollersheim's lawyers access while the data is being sort -- [tape cuts out for about 2 seconds]

John: This is terrifying, that a private group can get away with this. Isn't there -- shouldn't there have been some sort of legal supervision. Did the judge make a mistake and not -- having this stuff turned over to the court or to an independent auditor or something to that effect.

Narrator: Well, that's one of the key problems with this case for its opponents is that all of the materials that the plaintiffs wanted are now in their possession. So, essentially they have all the evidence in their hands to make their case, whether or not they can win it from that evidence, if I understand it is another story, particularly in light of this Washington Post decision, yesterday.

John: Well, is it legal -- in other words -- was procedure followed, is this the way things can go. Like if the Catholic Church decides I've defamed their Church, copyrighted Catholic Church secrets --

Narrator: Preview of the 21st Century, my friend.

John: Yes.

Chris: Well, there were Federal Marshalls present at both raids. So there may have been procedures errors on the part of the Marshalls but I don't -- I'm not a legal expert, so I can't say that and I don't know if the FACTNet III or the FACTNet II in Colorado have any recourse against the Religious Technology Corporation at all.

John: Is this information still available? Can you get this off the Internet.

Chris: Yes, it's available on a site in China and site in a former Soviet Union but I cannot -- I don't know what those sites are right off the top of my head.

John: So if people want information, they can still get it and will the information be -- do they have the capability of destroying all the information or if -- do people make backup files, keep the information, reload it if it gets erased by these guys.

Chris: It's in China, I don't think the Church of Scientology's going to have much effect there.

John: I guess so.

Chris: For one thing, China --

Narrator: John, I've got to let you go and, yes go ahead though, Chris, because we're really almost out of time and we have one more call to take.

Chris: China does not recognize American copyrights so there's not even a legal foot to stand on in that case.

John: Oh, ok.

Narrator: Thank you very much, John and we have time for one more call. Deb, hi your on the air.

Danos: Hi, I spoke to you earlier, Shawn.

Narrator: Right, your interview played earlier.

Danos: Right, and I managed to pick up the station from Denver where I was.

Narrator: This is Deborah Danos from the Church of Scientology.

Danos: Right, I wanted to shed a little light on some of the things that have been discussed here. I was present at Mr. Penny's house when the documents were taken. I just want to say that no judge just willy-nilly goes and lets this occur. Proper evidence was presented to him. He reviewed the evidence. He decided that there was enough evidence there to warrant going in and seizing the materials which was done by the U.S. Marshalls. Then, Mr. Wollersheim and Mr. Penny wanted the information turned over to their attorneys not in the hands of the Scientology lawyers. That was denied. We had offered them prior to have one of their people come in and view, they didn't want that. That was what they ended up with in court and they have not yet, to this

day, sent anyone down there to view the searches. Now, there's one more point here I'd like to make about Mr. Armstrong, who did sign --

Narrator: He's still on the line, if you two would like to converse.

Danos: Well, I just want to make this point about him. He signed the settlement agreement in '86 that he would do no media, no public, no private and he breached that contract. He was fined in January -- \$100,000 fine for breaking that contract and in February he filed bankruptcy and that's why he has the idea that it's unenforceable. However, this appearance today makes him liable for yet another breach and he's going to be hearing about.

Narrator: So you are saying you will pursue this. Mr. Armstrong, are you worried about that?

Gerry: Well, I have a great deal of concern about the Scientology organization. I think that it is in a very desperate condition and that things are very dangerous for those of us who have knowledge and are willing to speak out.

Danos: You have been very carefully --

Gerry: I have a concern but let me just respond and that is --

Narrator: And 30 seconds is what we've got here.

Gerry: Ok. It is the seriousness of what Scientology is involved in that make me come forward and makes me risk another \$50,000 or \$100,000 -- from those people.

Danos: Bull -- you got paid a very nice sum of money. You made a lot of money out of the Church.

Narrator: Can I ask one question? Why did the Church, what did Mr. Armstrong have to say that made it worth while for the Church to pay him off to keep quiet.

Danos: Because he was maligning, malicious maligning our religion in the same fashion as Mr. Wollersheim. We've got a group of people here. They seemingly are disconnected but they are absolutely all connected and they have grudge thing going on against the Church. And they'll tell you any kind of lies when in fact, every single one of them makes it their profession to see how they can make money off the church and then they break the agreement. He's going to be fined

again.

Narrator: All right, well thank you both for joining us. Mr. Armstrong and Deborah Danos. Thank you very much for calling back.

Danos: Thank you.

Narrator: Chris Yoder, final word. We've got just a second, we're in overtime. Thank you for being with us as well. It's been an interesting program. I hope you have a great labor day weekend. I have no idea what we're doing on this time slot next week. I know that you can relax with the Blues at 6:00 tomorrow night and you can stick around for folk music right about a minute from now. We are a Boulder County public radio, KGNU, Boulder 88.5; Fort Collins, 99.9; Word and Nederland 93.7. Bye bye.



**EXHIBIT 2**

1 Andrew H. Wilson, SBN #063209  
2 WILSON, RYAN & CAMPILONGO  
3 115 Sansome St., 4th Floor  
4 San Francisco, California 94104  
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11 (213) 960-1936  
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13 Attorneys for Plaintiff  
14 CHURCH OF SCIENTOLOGY  
15 INTERNATIONAL

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
17 FOR THE COUNTY OF MARIN

13	CHURCH OF SCIENTOLOGY	)	CASE NO. 157 680
14	INTERNATIONAL, a California not-	)	
14	for-profit religious corporation,	)	[CONSOLIDATED]
15		)	
15	Plaintiff,	)	DECLARATION OF JONATHAN
16		)	COLE IN SUPPORT OF CHURCH
16		)	OF SCIENTOLOGY
17		)	INTERNATIONAL'S MOTION FOR
17		)	SUMMARY ADJUDICATION OF THE
18	vs.	)	TWENTIETH CAUSE OF ACTION
18		)	OF THE SECOND AMENDED
19		)	COMPLAINT
19		)	
20	GERALD ARMSTRONG, et al.,	)	DATE: SEPTEMBER 29, 1995
20		)	TIME: 9:00 a.m.
21	Defendants.	)	DEPT: 1
21		)	TRIAL DATE: None set

22 I, Jonathan W. Cole, hereby declare:

23 1. My name is Jonathan W. Cole. I am a videographer,  
24 certified Notary Public for the State of California, trained to  
25 video record legal proceedings. I am over the age of eighteen  
26 and a resident of San Francisco, California. I have personal  
27 knowledge of the facts set forth in this declaration and could  
28 competently testify thereto if called as a witness.



**EXHIBIT A**

**EXHIBIT 3**

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8 Attorneys for Plaintiff  
CHURCH OF SCIENTOLOGY  
9 INTERNATIONAL

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 FOR THE COUNTY OF MARIN  
12

13 CHURCH OF SCIENTOLOGY ) CASE NO. 157 680  
INTERNATIONAL, a California not- )  
14 for-profit religious corporation, ) [CONSOLIDATED]  
15 Plaintiff, )  
16 ) DECLARATION OF LAURIE J.  
17 ) BARTILSON IN SUPPORT OF  
18 ) CHURCH OF SCIENTOLOGY  
19 ) INTERNATIONAL'S MOTION FOR  
20 ) SUMMARY ADJUDICATION OF THE  
21 ) TWENTIETH CAUSE OF ACTION  
vs. ) OF THE SECOND AMENDED  
22 ) COMPLAINT  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )  
GERALD ARMSTRONG, et al., ) DATE: SEPTEMBER 29, 1995  
29 ) TIME: 9:00 a.m.  
30 ) DEPT: 1  
31 ) TRIAL DATE: None set  
32 )

33 I, Laurie J. Bartilson, hereby declare:

34 1. My name is Laurie J. Bartilson. I am a member of the  
35 law firm Moxon & Bartilson, licensed to practice law in the State  
36 of California. I represent the plaintiff in the above-entitled  
37 matter. I have personal knowledge of the facts set forth in  
38 this declaration and could competently testify thereto if called  
as a witness.

1            2.    I have been litigating this case for more than three  
2 years, and am familiar with the defendant, Gerald Armstrong.

3            3.    On September 24, 1995, I reviewed a videotape of a  
4 demonstration outside the Church of Scientology of San Francisco.  
5 I recognized the street corner, with which I am also familiar.  
6 The videotape that I viewed bore a constant date and time stamp.  
7 According to that stamp, the tape covered 1:31 to 1:54 p.m. on  
8 September 9, 1995. The videotape depicted Gerald Armstrong  
9 speaking in front of the Church.

10           4.    I have also reviewed a transcript of the videotape, a  
11 true and correct copy of which is attached hereto as Exhibit A.  
12 The transcript is an accurate transcript of the audible portions  
13 of the videotape.

14           I declare under the penalty of perjury under the laws of the  
15 State of California that the foregoing is true and correct.

16           Executed this 24th day of September, 1995, at Los Angeles,  
17 California.  
18  
19

20   
21 Laurie J. Bartilson  
22  
23  
24  
25  
26  
27  
28





**Gerald Armstrong - 9 September 1995**

83 McAllister Street

Demonstration outside of Church of Scientology San Francisco

... they are claiming on the one hand that you are, I quote,... in the... of god...while in L. Ron Hubbards actual scriptures, he claims that... bible story... are what he calls this religious implants. Implants which were installed... pain, electronic pain, 76 trillion years ago and to this day have enslaved mankind. And moreover, Scientology has only... of freeing people from what he calls this religious slavery ...

That's what this strike is all about, that's why they must be exposed. But more important than the religious situation here, is that they are, in fact, a cover. Scientology... the muscle, intimidation, the bucks, fought a judgement in a district court which proclaimed the so-called writer of the religious scriptures and on the basis of that, they are able to raid people's homes and...people.

But that's not the real interest because those documents are so far out in the world that they don't really care. But what they seek is intelligence information... fancy themselves above the law...

intelligence operative.... David Miscavige.... intelligence operative.... They raided Wollesheim's home in order to obtain, not the religious scriptures because that's a fraud, they don't care...

The guy is so paranoid, he needs to obtain some kind of angle, leverage. ...by obtaining this information. Because the fact is, as is beng demonstrated... he has been exposed. I am here to tell you....

L. Ron Hubbard for a long time is being exposed. ...is a fraud... he is an absolute, undeniable fraud, but worse than being a fraud he used it to abuse people, to take away their life, treat them like slaves, get them to work for him...

...hook them on cigarettes. Isn't that true? Isn't that a big deal in the organization?

1:34

1:47

GA: How much do they pay you?

Cameranman: I usually get 75 an hour.

GA: Oh, that's not bad. So you're not a Scientologist?

Cameraman: I'm an officer of the court. I can't take sides.

GA: Well, you could take sides and still be a Scien... I mean you could be a Scientologist and say you didn't take Scien --

C: I could also be an Internet user, too.

GA: Oh, there's no doubt about that. You could be both. Now, you see --

Bambi: I'd like to make a statement about running marathons and how when you run a marathon it feels really intense, like you're running and you feel like your body is going to fall apart.

Cameraman: Continue, please.

Bambi: But you're doing it to yourself and in that, in this sense --

Cameraman: Can you go over there?

B: -- you're doing it to yourself.

GA: You'd rather, you'd rather have me? You'd rather have me than all of them? Look, there are so many, there are so many.

Bambi: -- your doing it to yourself, then it's not abuse.

GA: Go, look at them.

Bambi: What people are saying about abuse is not abuse.

C: He's blocking me....

GA: No, he isn't blocking you. Got -- turn your camera on him. This is invasive, this is invasive.

Bambi: Only abuse yourself, only abuse yourself

GA: -- invasive. Invasive

B: -- only abuse yourself by running a marathon. Never abuse others by telling them mean things. Because we're all --

GA: OK. I tried. I tried. You know, I figured that it was worth coming down here and -- oh, you got the audio going?

Cameraman: Yeah, sure.

G: Oh, OK. And I think that it is a very important and very dangerous issue and there has to be dialogue engaged in no matter how they ultimately take it because there's an openness here on the outside and the outside, is in fact, asking them to come out, come out and talk. Knock off those secrets. And I'll tell you why, they got to knock off the secrets.

Bambi: -- to get strong, run in marathons!

GA: That's right. And even L Ron Hubbard, in his own writing, in his saner moments, he even said, don't have the secrets. However, he never could get over his greed. And that's why he knew taht there was money in secrets.

In truth, there are no secrets, the stuff is out there. There's no secrets about ... 76 million years ago, the volcanos, any of that. There are no secrets.

The problem is, is the way it has been used on the basis of secrets which cannot exist, this organization engineered criminal raids on individuals who are doing nothing other than stand up to the criminality.

It is not over yet. Scientology is going to have to open up. It's going to have to divulge not only its so-called religious secrets, but its real secrets which are the criminal and tortious acts and secret acts , done in secret, through private investigators and secret lawyers and secret communications from secret people at the top of the secret organization of Scientology.

They're going to have to come forward and say what has been done to steal, destroy, pervert the civil rights of individuals that they have targeted as enemies for no other reason than that it served their criminal purposes.

1:50

PROOF OF SERVICE

STATE OF CALIFORNIA            )  
  )    ss.  
COUNTY OF LOS ANGELES        )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On September 25, 1995, I served the foregoing document described as FURTHER EVIDENCE IN SUPPORT OF PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT on interested parties in this action, by sending a true copy by hand delivery to:

FORD GREENE  
HUB Law Offices  
711 Sir Francis Drake Blvd.  
San Anselmo, CA 94960-1949

and by U.S. Mail to:

MICHAEL WALTON  
700 Larkspur Landing Circle  
Suite 120  
Larkspur, CA 94939

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 25, 1995 at Los Angeles, California.

\_\_\_\_\_  
Print or Type Name

\_\_\_\_\_  
Signature